

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

JOSEPH VAN LOON; TYLER ALMEIDA;
ALEXANDER FISHER; PRESTON VAN LOON;
KEVIN VITALE; and NATE WELCH,

Plaintiffs,

- against -

DEPARTMENT OF THE TREASURY; OFFICE OF
FOREIGN ASSETS CONTROL; JANET YELLEN,
in her official capacity as Secretary of the Treasury; and
ANDREA M. GACKI, in her official capacity as Director
of the Office of Foreign Assets Control,

Defendants.

Civil Action No. 6:22-cv-920-ADA-JCM

JOINT MOTION FOR ENTRY OF SCHEDULING ORDER

The Parties hereby jointly file this motion for entry of an order adopting the schedule proposed below for further proceedings in this case. In support thereof, the Parties respectfully state as follows:

1. Plaintiffs filed this action under the Administrative Procedure Act (APA), 5 U.S.C. §§ 500 *et seq.* Because this is an APA case, the Parties agree that this case is exempt from the initial disclosure requirement under Fed. R. Civ. P. 26(a)(1)(B)(i) and from the Court's scheduling-order requirement under Local Rule CV-16(b). The Parties further agree that this case is appropriately resolved by submission of the administrative record followed by cross-motions for summary judgment.
2. After conferring, the Parties jointly propose the following schedule:

EVENT	DATE
Defendants produce the administrative record to Plaintiffs, and file notice of service and certification of the administrative record with the Court	On or before January 13, 2023
Plaintiffs file any objections to the administrative record	On or before February 10, 2023
Parties file a proposed summary-judgment briefing schedule	On or before February 10, 2023

The Parties reserve the right to seek modification of the proposed schedule.

3. A proposed order approved by the Parties is being submitted with this Motion for the Court's consideration.

Dated: December 8, 2022

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Respectfully submitted,

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